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Attorney for Defendant
ROBERT DUENAS QUIDACHAY

FILED
DISTRICT COURT OF GUAM

OCT - 4 2007 *Wbe*

JEANNE G. QUINATA
Clerk of Court

IN THE DISTRICT COURT
OF GUAM

UNITED STATES OF AMERICA,)	CRIMINAL CASE NO. 06-00032
)	
)	
Plaintiff,)	
)	
vs.)	EMERGENCY MOTION FOR
)	RELEASE TO VISIT MOTHER
)	HOSPITALIZED AT GMH AND
ROBERT DUENAS QUIDACHAY)	AND WHO MAY SOON DIE
)	
Defendant.)	
_____)	

COMES NOW Defendant by and through counsel and states as follows:

1. Defendant's mother is hospitalized at GMH and is suffering from Ascites, Diabetes, and Urosepsis. Urosepsis is a blood infection. Her condition is "poor, possible demise."

2. Defendant's mother's physician, Christopher Swanson, M.D., has requested that Defendant be permitted to visit his mother. Dr. Swanson's request is attached herewith as Exhibit A.

3. Defendant has pleaded guilty. He has cooperated with authorities. His PSR has been prepared. His total offense level is 21 and his criminal history category is I.

The "safety valve" applies and his resulting sentencing range is 37 - 46 months. He has

ORIGINAL

United States of America v. Robert D. Quidachay
Emergency Motion for Release to Visit Mother Hospitalized at GMH and Who
May Soon Die
October 2007

cooperated with authorities and defense counsel has been informed that a downward departure motion for substantial assistance will be filed. Defendant has been in custody for approximately fourteen months.

4. Defense counsel expects that Defendant has 0 - 12 months left of confinement to serve.

5. It is requested that Defendant be released for 24 hours, unsupervised. During this time, he will reside at his mother's residence.

Respectfully Submitted,

LAW OFFICES OF WILLIAM L. GAVRAS

Dated: October 4, 2007

By: 

WILLIAM L. GAVRAS, ESQ.
Attorney for Defendant
ROBERT D. QUIDACHAY

CERTIFICATE OF SERVICE

I certify that I have caused to be served upon the Office of the United States Attorney and the United States Probation Office, a true and correct copy of this document on or before October 4, 2007.

LAW OFFICES OF GORMAN & GAVRAS

Date: October 4, 2007

By: 

WILLIAM L. GAVRAS, ESQ.
Attorney for Defendant
ROBERT DUENAS QUIDACHAY



Guam Memorial Hospital Authority Aturidåt Espetåt Mimuriåt Guåhan

850 GOV. CARLOS CAMACHO ROAD
OKA, TAMUNING, GUAM 96913
TEL: 647-2444 or 647-2330
FAX: (671) 649-0145

October 3, 2007

To: Warden Crisostomo
Department of Corrections

From: Christopher Swanson, MD

Dear Sir,

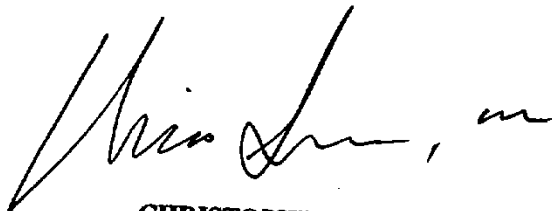
Mrs. Anita Rosario is currently admitted since September 30, 2007 at Guam Memorial Hospital Authority, being treated for Ascites, Diabetes and Urosepsis. Her prognosis is "poor."

Please allow her son Robert D. Quidachay to visit, as her condition is "poor, possible demise."

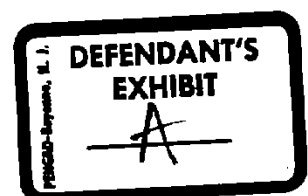
Should you have any questions please feel free to call me through the hospital operator 647-2555 or through my pager at 476-0601.

Thank You for your help and compassion in this matter.

Christopher Swanson, MD



CHRISTOPHER SWANSON, M.D.
G.M.H.A. TAMUNING, GU 96911
T: 671-647-2555 P: 671-476-0601
N.P.I. # 1023016847



Medical Record No.	Patient Number	Admit Date	9/30/2007	Time	23:15	LOS	Rm#/Loc	Adm Source	Staff
86365	10628806	Disch Date		Time		M/S	ERH03	07	DC
Patient Name		SS No	586-62-4932	Birth Date	7/22/47	Age	60Y	Sex	F
ROSARIO, ANITA QUIDACHAY								Rel	CATH G
Admitting Diagnosis		ASCITES DM UROSEPSIS							
Patient Address (Mailing)		PO BOX 23765						Telephone #	477-9662
		GMF BARRIGADA, GU 96921						Telephone #	-
Employer/Occupation		UNEMPLOYED						Telephone #	-
Guarantor Name		QUIDACHAY, CAROLINE DUENAS				Relationship	NATURAL CH	SS #	510-78-8986
Address		PO BOX 23765						Telephone #	477-9662
		BARRIGADA, GU 96921						Telephone #	-
Employer/Occupation		UNEMPLOYED						Telephone #	-
Concerned Party Name		QUIDACHAY, CAROLINE				Relationship	DAUGHTER	Telephone #	477-9662
Insurance Name		TAKECARE - FEDERAL				Certification #	000040478		
Insurance Name						Certification #			
PRINCIPAL DIAGNOSIS:						ICD-9 CODE			
SECONDARY DIAGNOSES:						ICD-9 CODE			
COMPLICATIONS									
PRINCIPAL PROCEDURE:						ICD-9 CODE			
SECONDARY PROCEDURE:						ICD-9 CODE			
DISCHARGED	WITH	AGAINST	DIED	UNDER	OVER	AUTOPSY	YES	NO	
ALIVE	APPROVAL	ADVICE		48 HRS	48 HRS				
ADMIT PHY: SWANSON, CHRISTOPHE				CONSULT PHY:					
DATE OF COMPLETION			ATTENDING PHYSICIAN SWANSON, CHRISTOPHE						
IN-PATIENT REGISTRATION									
GUAM MEMORIAL HOSPITAL AUTHORITY									
ADMISSION AND DISCHARGE									

ROSARIO, ANITA QUIDACHAY
 10628806 MS F
 07/22/47 TAKECARE - FED
 86365 SWANSON, CHRISTOPHE
 Admit 09/30/07
 Bed ERH03



P.O. Box 6578 Tamuning, Guam 96931
Telephone: (671) 646-5825 Fax (671)
646-0786

March 13, 2007

Re: Rosario, Anita (Dob: 7/22/47)

To Whom It May Concern:

Mrs. Rosario suffers from Chronic Liver Cirrhosis secondary to Hepatitis and is in poor health.

Should there be any questions, please contact me at one of the numbers above, or e-mail me at:
walter.stratton@takecareasia.com.

Very Respectfully,

W. E. Stratton, PA-C